

ORIGINAL

York County Prison.
3400 Concord Road,
York, P.A. 17402
Date, Dec, 15, 2000

(22)
12-20-00
SC

#55438 J.D.
J. Gayle

DESmond GAYLE,
PLAINTIFF

V.

Civil No. 1:CV-00-0881

YORK County Prison
DEFENDANT

FILED
HARRISBURG

DEC 19 2000

MARY E. D'ANDREA, CLERK
Per 98
DEPUTY CLERK

BRIEF IN Opposition To DEFENDANTS'
Motion To Dismiss.

I Desmond Gayle, will continue to challenge the Defendant Motion in Court, because of MANY Reasons, that Falls under the LAW, of the Court.

I will state these Reasons
in Court, as Defendant ()

“
PLAINTIFF DEVELOPE SICKNESS
While in Solitary Confinement”

- ① → About the ^(year 2000) 19th of April, I Develop a Constipation in my Intestine and Reported it to the nurse, But didn't do anything about it, not call me up to her Department for treatment.
- ② → On About the 20th of April 2000, I Develop a Urination problem, even the normal color of my urine, changes completely and my belly (belly) started to pain me inside, I Reported it to the male nurse, and female nurse; in the AFTER-NOON, and also in the morning. The Female nurse laugh at me, but the male nurse told me, to fill out a Medical Form, and send it up to the Medical Department, at the same time he urged the Female nurse, not to laugh at the situation.

③ → AS the Clock Race to Midnight, my Sickness gotten Worst. At About 1:30 AM, in the Morning, I WAS curl up on the floor; Crying, And suffering from severe, AND Extreme PAIN, in my Stomach. When the Guard on duty saw me, he open the Cell Door, After Contacted Medical, then took me to the Medical Department, AS promptly AS he could.

④ → "Malpractice of The Nurse, At The Medical Department"
At About 2:00 AM in the morning, on Friday April, 21st, 2000, I ARRIVED at The Medical Department, And explained my illness to the Nurses working that shift. Both Nurses told me, they do not have any Medication to give me, And there is Nothing they could do for me. I WAS shock, when they told me such News. I didn't believed them.

Conflict with both of them, ON
 About (September, 4th, 1999)

When I was in the Infirmary.

These two NURSES; Refused me
 Medical Treatment, that early
 Morning, because they have been
 Carrying personal Grievencies
 Against me.

⑤ → When the Nurses learned that
 the "Foodloaf gotten me sick,"
 they Refused To Agree on the
 MAFORMATION of the Foodloaf.

At the peroration of their
 denial ARGUMENTS, the two
 Malignant And Malevolent Nurses,
 Told the Correctional Officer to
 take me back to Solitary -
 Confinement.

⑥ → I Almost died that morning from
 A Serious sickness CAUSE by the
 Foodloaf being served, three times
 per day, for BREAKFAST, LUNCH AND
 DINNER, AND NOTHING to DRINK.

Most people system cannot handle
 such treatment than will not survive.

PERILOUS Policy Of THE WARDEN

⑦ → The Nurses told me that night During their ~~Agan~~ ARGUMENTS, that they Cannot change my diet to Regular Food, because this is a MANDATE, from the WARDen. In the Confinement area the memorandum stated that the Food of policy, came directly From "WARDen HOGAN", it WAS signed With his signature.

⑧ → My PERSONALITY And Respond To The LAW

I Came from A good Family. I AM not MALICIOUS And FRIVOLOUS, TOWARDS the DEFENDANTS in this Court CASE. You have Violated my Rights.

I AM ASKING the Court, to order the Defendant, to Compensate me, With the Sum of Three Million Dollars